

FILED

IN THE CIRCUIT COURT OF LAUDERDALE COUNTY, MISSISSIPPI
TENTH JUDICIAL CIRCUITCHRISTOPHER THOMPSON, as
Personal Representative of the Estate of
CHRISTIAN ANDREACCHIO

PLAINTIFF

VS.

CAUSE NO.: 17 CV 024 (C)

DEFENDANTS

Dylan Swearingen and
Whitley GoodmanCOMPLAINT
(Trial by Jury Requested)

COMES NOW the Plaintiff, Christopher Thompson, as Personal Representative of the Estate of Christian Shane Andreacchio, deceased, on behalf of said Estate and the survivors of Christian Shane Andreacchio (hereinafter Andreacchio), and hereby files this Complaint, and show that they are entitled to relief against the Defendants based upon the following allegations:

1. Plaintiff, is an adult resident citizen of Lauderdale County, Mississippi.
2. Christopher Thompson is the duly appointed Personal Representative of the Estate of Christian Shane Andreacchio, and is therefore authorized to bring this action on behalf of said Estate. Letters of Administration have been issued by the Lauderdale County Chancery Court.
3. The potential beneficiaries of a recovery for the wrongful death of the decedent are the deceased's parents Todd & Rae Andreacchio, and the Estate of Christian Shane Andreacchio.
4. Venue is proper in this Court pursuant to the provisions of Section 11-11-3(1)(a)(i) of the Mississippi Code of 1972 annotated, as the subject matter occurred and the cause of action arose in Meridian, Lauderdale County, Mississippi.
5. Defendant Dylan Swearingen is an adult resident citizen of Lauderdale County, Mississippi.
6. Defendant, Whitley Goodman, is an adult resident citizen of Lauderdale County,

Mississippi.

7. On or about February 24, 2014, Decedent was at home located in Lauderdale County, Mississippi.

8. On said date, also present at Decedent's residence was Whitely Goodman and/or Dylan Swearingen. While the Defendants were present, the Deceased was shot and killed. Rather than report the death to law enforcement, the Defendants traveled to a bank and attempted to withdraw money from the Decedent's bank account. As such, the Defendants, jointly and severally, failed to act reasonably as a reasonable person should do, by either notifying emergency medical responders, law enforcement, or providing first aid themselves.

WHEREFORE, Plaintiff demands all damages recoverable against DYLAN SWEARINGEN AND WHITLEY GOODMAN under the Mississippi Wrongful Death Act, Mississippi Code Section 11-7-13, for the injuries and death inflicted upon CHRISTIAN SHANE ANDREACCHIO, including but not limited to, loss of support, loss of society, past and future mental pain and suffering, past and future loss of services, past and future loss of earnings, medical and funeral expenses, any and all damages recoverable individually to Todd and Rae Andreacchio, as surviving parents, and for any such further relief this Court deems just and proper. Plaintiff also seeks punitive damages, compensatory damages, and any and all damages allowed by Mississippi law, prejudgment interest, and post-judgment interest, attorney's fees, and all costs of this proceeding with such final amount being an aggregate sum equal to the maximum amount of recovery allowed, plus any recovery to be determined by a jury or finder of fact and allowed under any applicable state laws and guidelines.

This the 24th day of February, 2017.

Respectfully submitted,

CHRISTOPHER THOMPSON

By:

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